

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF WYOMING**

RALPH PETER JOHN HENRY  
ROCHARD, an individual; and CON  
SMITH, an individual,

*Plaintiffs,*

v.

ONE WORLD MESSENGER a/k/a One  
World Messenger LLC, a Wyoming  
Corporation; TEK RESOURCES LLC, a  
Wyoming Limited Liability Company;  
JAMES EDWARD BAME, an individual;  
and IPLA P.A., a California Professional  
Association.

*Defendants.*

Case No. 2:23-cv-00194-ABJ

**MOTION FOR CLERK’S DEFAULT AS TO DEFENDANT ONE WORLD  
MESSENGER LLC**

COMES NOW Plaintiffs Ralph Peter John Henry Rochard and Con Smith (collectively “Plaintiffs”), by and through counsel, and hereby give notice that Defendant One World Messenger a/k/a One World Messenger LLC (“One World”) has failed to plead or otherwise defend the Complaint within the time allowed under the Federal Rules of Civil Procedure. Plaintiff further states and alleges:

1. On November 15, 2023, counsel for Plaintiff caused One World to be served with the Complaint, its accompanying exhibits, and the Summons in this matter on November 15, 2023. Proof of service was filed on November 20, 2023. ECF 12.
2. On November 27, 2023, on behalf of One World and without representation by counsel, Kent Kristensen improperly e-mailed chambers and attempted to submit numerous

documents regarding “many mistakes in this lawsuit.” A copy of that correspondence is attached as **Exhibit 1**.

3. On November 27, 2023, counsel for Plaintiffs responded to Mr. Kristensen’s e-mail and advised him that that Mr. Kristensen could not represent the company in this litigation and must hire an attorney. A copy of that correspondence is attached as **Exhibit 2**.

4. On December 7, 2023, Judge Johnson’s Judicial Assistant informed Mr. Kristensen that the court did not accept emailed pleadings and that he needed to mail any documents to the court. *See Exhibit 1*.

5. Pursuant to FRCP 12(a)(1)(A)(i) and this Honorable Court’s order, the date for One World to answer or otherwise respond to the Complaint in this matter was December 6, 2023.

6. Pursuant to FRCP 55(a), when the failure of a party to plead or otherwise defend is shown, the Clerk must enter the party’s default.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs request that the Clerk enter a default against One World.

Dated: December 14, 2023

Respectfully Submitted,

**LAW OFFICES OF ROBERT V. CORNISH, JR., PC**

*/s/ Robert V. Cornish, Jr.*

**ROBERT V. CORNISH, JR.**

680 South Cache Street, Suite 100

P.O. Box 12200

Jackson, WY 83001

Office: (307) 264-0535

Email: [rcornish@rcornishlaw.com](mailto:rcornish@rcornishlaw.com)

*Attorney for Plaintiffs*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on December 14, 2023, I caused to be sent copies of the foregoing to Defendant One World Messenger LLC via United States postal service mail to its registered agent, Cloud Peak Law Group PC, authorized by appointment or by law to receive service of process for One World Messenger d/b/a One World Messenger LLC. Copies of this pleading were also sent to counsel for Defendants TEK Resources LLC, James Bame, and IPLA P.A. via ECF notification at lbuckley@hkwyolaw.com and mburke@hkwyolaw.com.

/s/ Robert V. Cornish, Jr.